

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Kenneth Taggart

21-12476-AMC

Debtor

KENNETH J. TAGGART

Chapter 11

Landlord

Adversary No: 22-00019-AMC

Kenneth Taggart

Plaintiff

v.

Gregory Funding, LLC

9400 S.W. Beaverton-Hillsdale Hwy

Suite #131

Beaverton, OR. 97005

v.

Great Ajax Operating Partnership, L.P.,

P.O. Box 25430,

Portland, OR, 97298

v.

AJX Mortgage Trust I, a Delaware

Trust, : Wilmington Savings Fund

Society, FSB, : C/O Thetis

Management, LLC,

9400 SW Beaverton, Hillsdale Hwy,

131 :Beaverton, Oregon 97005

v.

Defendants

v.

Doe

Defendants



**Debtors Motion for "Leave" to file AMENDED ADVERSARY COMPLAINT**

Debtor filed an Amended Adversary Complaint in response to Defendant's Motion to Dismiss Motion to Dismiss pursuant to FRBP 7015 and RFCP 15 which allows for an Amended Complaint to filed as a matter of right pursuant to RFCP 15.

On April 27, 2022 at a hearing regarding the original Complaint, it was noted that an Amended Complaint was filed with this court. The court noted that the Amended Complaint would be considered by the court and allowed as a response by Debtor but noted leave should be requested without citing any specific rule. As Such Debtor has contemporaneously filed a response the Defendants Motion to Dismiss to the Amended Complaint of Debtor and pursuant to the courts direction of the court of the April 27,2022 hearing.

Kenneth Taggart, Debtor

May 3,2022

